

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ELLEN GERHART, ELISE	:	
GERHART, ALEX LOTORTO	:	
and ELIZABETH GLUNT,	:	
Plaintiffs and	:	CIVIL ACTION NO. 1:17-cv-1726-YK
Counterclaim Defendant	:	
	:	
v.	:	
	:	
ENERGY TRANSFER	:	
PARTNERS, <i>et al.</i> ,	:	(Judge Kane)
Defendants and	:	
Counterclaimants	:	

**NOTICE OF DEPOSITION OF A CORPORATE DESIGNEE PURSUANT
TO RULE 30(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure Rule 30(b)(6), counsel for Plaintiff notifies you that Plaintiff will take the deposition, under oath, of the designated representative(s) of TigerSwan on Wednesday, December 1, 2021 beginning at 1:00 p.m., via zoom.

The deposition is being taken for the purposes of discovery and all other purposes allowed under the Federal Rules of Civil Procedure. The deposition will be taken before a notary public or some other officer authorized by law to administer oaths. The deposition will be taken by a stenographer and will continue from day to day until completed. You are invited to attend and cross-examine.

Pursuant to Rule 30(b)(6), TigerSwan is requested to identify and make available for deposition those officers, directors, managers, managing agents, or other persons who consent to testify on its behalf with respect to matters known or reasonably made available to it with respect to the following:

1. Your Interrogatories and Requests for Production of Documents directed to Sunoco.

2. Your communications with PA Pipeline Review, PA Alliance for Energy, Ciesler Media, and/or Bravo Group pertaining to the Gerharts, their property, their supporters, Camp White Pine, and this lawsuit.
3. Your communications with the Pennsylvania State Police and the Huntingdon County Sheriff's Office pertaining to the Gerharts, Alex Lotorto, their property, their supporters, Camp White Pine, and this lawsuit.
4. Nick Johnson, Robert Rice, and Kurt Merriweather
5. The Gerharts, their property, and Camp White Pine;
6. Your work in Huntingdon County, including:
 - a. Contractors and subcontractors;
 - b. Terms and scope of work;
 - c. Determinations of when, where, and why to utilize such services;
 - d. Use of active-duty law enforcement officers for security and surveillance services;
 - e. Communications with law enforcement agencies pertaining to actual or perceived security or surveillance issues;
 - f. Use of aerial surveillance of the pipeline route;
 - g. Use of aerial surveillance of properties adjacent or near the pipeline route;
 - h. Surveillance of the Gerharts, Alex Lotorto, their property, their supports, Camp White Pine;
 - i. Monitoring the social media activity of the Gerharts, Alex Lotorto, their property, their supporters, Camp White Pine, and activity related to this lawsuit;
 - j. Utilization of social media campaigns targeting the Gerharts, Alex Lotorto, their property, their supporters, Camp White Pine, and this lawsuit.
7. Your work in Pennsylvania elsewhere than Huntingdon County, including:
 - a. Contractors and subcontractors;
 - b. Terms and scope of work;
 - c. Determinations of when, where, and why to utilize such services;
 - d. Use of active-duty law enforcement officers for security and surveillance services;
 - e. Use of aerial surveillance of the pipeline route;
 - f. Use of aerial surveillance of properties adjacent or near the pipeline route;

- g. Monitoring social media activity relating to the Mariner East 2 and Mariner East 2X pipelines;

Pursuant to Rule 30(b)(2), Plaintiff also requests that TigerSwan produce any and all documents and tangible things relevant to the foregoing topics at the time of the deposition, to the extent not previously produced.

WILLIAMS CEDAR

/s/ CHRISTOPHER MARKOS

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Dated: November 3, 2021

Attorney for Plaintiffs